IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SUN CHENYAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 19 cv 5705
	)	
THE PARTNERSHIPS AND	)	Judge Elaine E. Bucklo
UNINCORPORATED ASSOCIATIONS	)	
IDENTIFIED ON SCHEDULE "A",	)	
	)	
Defendants.	)	

PLAINTIFF'S MOTION FOR JUDGMENT ON THE ANSWER OF THIRD
PARTY CITATION RESPONDENTS AND TURNOVER OF FUNDS

Plaintiff, Sun Chenyan, in support of Plaintiff's Motion for Judgment on the Answer of

Third Party Citation Respondents Context Logic, Inc. and PayPal., and for Turnover of Funds,

states as follows:

1.   On January 29, 2020, Judgment was entered in this Court in favor of the Plaintiff, Sun

Chenyan and against Defendants identified on Schedule A in the total amount of $650,000. See

Exhibit A [Docket Number 42]. Since the date of the Judgment and service of the Third

Party Citations to Discover Assets, Plaintiff has not collected any money. There is now due the

sum of $650,000.

2.   A Citation to Discover Assets to a Third Party was served on Context Logic, Inc. on

February 5, 2020, and on PayPal on February 19, 2020. See Citations attached as Exhibits B and

C, respectively.

3.   Context Logic, Inc. served its Answer to the Third Party Citation on February 19, 2020 indicating that it had in its possession non-exempt funds belonging to certain Defendants in the total amount of $12,390.94. See Context Logic, Inc.'s Answer attached hereto as Exhibit D.

4.   PayPal served its Answer to the Third Party Citation on February 25, 2020 indicating that it had in its possession non-exempt funds belonging to certain Defendants in the total amount of $2,038.55. See PayPal's Answer attached hereto as Exhibit E.

5.   Supplementary proceedings to enforce a judgment are governed by Federal Rule of Civil Procedure 69(a)which provides that a district court is to use state procedure governing the execution of any such judgment. Fed. R. Civ. P. 69(a).

6.   Section 5/2-1402 of the Illinois Code of Civil Procedure provides that when assets of a judgment debtor not exempt from the satisfaction of a judgment are discovered, a court may enter an order or judgment compelling the person cited to deliver said assets. 735 ILCS 5/2-1402.

7.   As such, the Plaintiff is entitled to the non-exempt property of Defendants in partial satisfaction of the Judgment Balance remaining due.

         WHEREFORE, Plaintiff Sun Chenyan respectfully requests that this Court enter a Judgment on its Third Party Citation against Context Logic, Inc. and PayPal in the amount indicated on their Answers to the Third Party Citation to Discover Assets, order Third Party Citation Respondents Context Logic, Inc. and PayPal to turnover to Plaintiff in partial satisfaction of the judgment the Defendants' property indicated on their Answers to the Third Party Citation to Discover Assets, and for such other relief that this Court deems just and proper.

Respectfully Submitted:
/s/ Charles E. McElvenny
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